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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LA MOJARRA LOCA, INC.

Plaintiff,

v.

WELLS FARGO FINANCIAL
SERVICES LLC; WELLS FARGO
BANK, N.A.; WELLS FARGO &
CO.; FIRST DATA MERCHANT
SERVICES CORPORATION, DOES
I-X INDIVIDUALLY; ROE
CORPORATIONS I-X.

Defendant.

CASE NO.: 2:19-CV-00725-JCM-CWH

STIPULATION AND
ORDER TO EXTEND TIME TO FILE
OPPOSITION

(First Request)

Pursuant to LR 7-1, and 7-2 and LR IA 6-1 and 6-2, Plaintiff, LA MOJARRA LOCA, INC., by and through Daniel W. Anderson, Esq. and Defendants WELLS FARGO FINANCIAL SERVICES LLC; WELLS FARGO BANK, N.A.; WELLS FARGO & CO.; FIRST DATA MERCHANT SERVICES, by and through Jarrod L. Rickard, Esq., hereby stipulate to extend Plaintiff's time to file an opposition to Defendants' Motion to Dismiss or in the Alternative to Transfer Venue. The stipulation is based on the following:

1. Plaintiff filed its complaint against Defendants in Clark County District Court on March 12, 2019 and served Defendants on March 29, 2019.

2. Defendants filed their notice or removal to this Court on April 29, 2019 and subsequently filed a Motion to Dismiss or in the Alternative to Transfer Venue on May 6, 2019.

3. Plaintiff's counsel logged into CM ECF on June 6, 2019 to check on the status of Defendants' answer and discovered that a Motion to Dismiss had been filed. However, Plaintiff's counsel had not received notice or service of the filing.

4. The lack of notice and service was due to the fact that the email address on file with the Court for Plaintiff's counsel, danderson@millsandmillsllc.com, was from a domain that is no longer in use by the firm. Counsel did not realize the email address had not been updated, but immediately updated the address to dan@millsnv.com, which uses the firm's current domain and is counsel's correct address.

5. Counsel submits that the foregoing constitutes excusable neglect and hereby stipulates to extend the time for filing of Plaintiff's opposition to **Friday, June 13, 2019**.

Dated this ____ day of June 2019


MILLS & ANDERSON

SEMENZA| KIRCHER| RICKARD

/S/ Daniel W. Anderson
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IT IS SO ORDERED


UNITED STATES DISTRICT JUDGE

DATED: June 12, 2019